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ex rel. its Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN JR, NATHAN
ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE STATE OF NEVADA, *EX REL.* ITS
NEVADA DEPARTMENT OF
CORRECTIONS, and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR ENLARGEMENT
OF TIME FOR RESPONSIVE
PLEADINGS AND [PROPOSED] ORDER
THEREON**

(First Request)

Plaintiffs DONALD WALDEN JR., NATHAN ECHEVERRIA, AARON DICUS,
BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR, and DANIEL TRACY on
behalf of themselves and all other similarly situated, and Defendant STATE OF NEVADA, *EX*
REL. ITS DEPARTMENT OF CORRECTIONS (collectively “The Parties), by and through their
respective counsel of record, hereby stipulate and agree to extend the time for both Parties to file
their respective responsive pleadings as set forth below.

This stipulation is submitted in compliance with LR IA 6-1. The Parties are requesting these extension due to the volume of motions pending, the complexity and fact intensive nature of the responsive pleadings, counsels' professional commitments, existing workload, and challenges of working remotely due to the COVID-19 crisis, including slower connectivity, communications delays, and obtaining records necessary to the motions. Good cause exists for the requested extensions.¹

Accordingly, the Parties further stipulate and agree to extend the deadlines as follows:

1. Plaintiffs' Opposition to NDOC's Motion to Dismiss Claims of Non-Participating Plaintiffs (ECF No. 274) currently due 4/21/20 shall be extended one (1) calendar week to on or before **Tuesday, April 28, 2020**. Defendant's Reply In Support Of shall be due fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

2. Plaintiffs' Opposition to NDOC's Motion to Decertify Collective Action (ECF No. 279) currently due 4/22/20 shall be extended one (1) calendar week to on or before **Wednesday, April 29, 2020**. Defendant's Reply In Support Of shall be due twenty-one (21) calendar days after the filing of Plaintiffs' Opposition.

3. Plaintiffs' Opposition to NDOC's Motion to Exclude Evidence from Plaintiffs' Expert ERC (ECF No. 282) currently due 4/22/20 shall be extended two (2) calendar weeks to on or before **Wednesday May 6, 2020**. Defendant's Reply In Support Of shall be due fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

4. Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on Sovereign Immunity (ECF No. 276) currently due 4/29/20 shall be extended two (2) calendar weeks to on or before **Wednesday, May 13, 2020**. Defendant's Reply In Support Of shall be due fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

¹ The Parties do not request extension for: (1) Plaintiffs' Reply in Support of Plaintiffs' Motion for Partial Summary Judgment, due 4/20/20, and (2) Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on the Statute of Limitations (ECF No. 280) due on 4/29/20.

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5. Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on the Merits of Plaintiffs FLSA Claims (ECF No. 283) currently due 4/29/20 shall be extended three (3) calendar weeks to on or before **Wednesday, May 20, 2020**. Defendant's Reply In Support Of shall be due fourteen (14) calendar days after the filing of Plaintiffs' Opposition.

The Parties agree that the requested extension furthers the interest of this litigation and is not being requested in bad faith or to delay these proceedings unnecessarily.

IT IS SO STIPULATED.

Dated: April 9, 2020.

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/s/Joshua D. Buck

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Dated: April 9, 2020.

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ORDER

IT IS SO ORDERED.

Dated this 13th day of April, 2020.



U.S. District/Magistrate Judge